It is inevitable that BPL systems will be rolled out. This being the case I feel that it is important that the following questions be answered.

1. Can BPL systems be operated without using any of the Amateur Radio spectrum between 2 and 80 megahertz? Proponents of BPL have said that their systems can notch out frequencies that are being used. Hams do not have channels we have bandwidth. There is no way that the BPL device will be able to know what I want to listen to and when. Amateur Radio operators are authorized to and commonly do operate on any ham band, at any time, at will. A proactive approach to steering clear of these bands of frequencies would be good for the amateur radio community as well as the community that surrounds the amateur radio operator.

2. What procedure will the power company implement for handling BPL-related interference complaints from Amateur Radio operators, shortwave listeners and other HF spectrum users? Specifically:

- How would radio users identify specific BPL signals?
- Who would radio users call to list their complaint?
- Would this service be available 24/7?
- How long might we expect it to take to reach a resolution, assuming it is really a BPL problem that requires spectrum shifting, notching or other mitigation technique? (One hour? 10 hours? 10 days, etc.?)
- Would a service call or in-person investigation be required to confirm the interference source before mitigation is attempted?

3. How would you handle complaints from mobile Amateur Radio users who come across BPL interference while driving?

I would also question if the test procedure is adaquate. Amateurs use a varity of antennas, some unity gain and other high gain and directional. As propagation shifts so does the directional antenna. I believe that your test should assume that high gain directional antennas are used.

Thank you for your consideration to my comments.

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